

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
SOUTHEASTERN DIVISION

UNITED STATES OF AMERICA

v.

TYRICE EXCELL AKINS, KURTIS  
WILLIAM JOHNSON, TARA MALINDA  
RIDLEY, and MICHELLE ANN LATTE

I N D I C T M E N T

Case No. \_\_\_\_\_

Violation: 18 U.S.C. §§ 371, 1591(a),  
1591(b)(2), 1591(c), 1594, 2421,  
2423(a), and 2

COUNT ONE

**Sex Trafficking of Children**

The Grand Jury Charges:

From on or about January 31, 2015, and continuing until on or about  
February 7, 2015, in the District of North Dakota, and elsewhere,

TYRICE EXCELL AKINS  
and  
KURTIS WILLIAM JOHNSON

knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, a person, namely, MT, and did benefit, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained MT, knowing, and in reckless disregard of the fact, and having had a reasonable opportunity to observe MT, that MT had not attained the age of 18 years, and would be caused to engage in a commercial sex act, as defined in Title 18, United States Code, Section 1591(e)(3);

In violation of Title 18, United States Code, Sections 1591(a), 1591(b)(2), 1591(c), and 2.

COUNT TWO

**Sex Trafficking of Children**

The Grand Jury Further Charges:

From on or about March 4, 2015, and continuing until on or about March 7, 2015,  
in the District of North Dakota, and elsewhere,

TYRICE EXCELL AKINS  
and  
KURTIS WILLIAM JOHNSON

knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, a person, namely, MT, and did benefit, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained MT, knowing, and in reckless disregard of the fact, and having had a reasonable opportunity to observe MT, that MT had not attained the age of 18 years, and would be caused to engage in a commercial sex act, as defined in Title 18, United States Code, Section 1591(e)(3);

In violation of Title 18, United States Code, Sections 1591(a), 1591(b)(2), 1591(c), and 2.

COUNT THREE

**Conspiracy to Commit Sex Trafficking**

The Grand Jury Further Charges:

From in or about December 2014, and continuing until on or about March 7, 2015,  
in the District of North Dakota, Florida, and elsewhere,

TYRICE EXCELL AKINS  
and  
KURTIS WILLIAM JOHNSON

knowingly combined, conspired, confederated, and agreed with each other and others,  
both known and unknown to the grand jury, to recruit, entice, harbor, transport, provide,  
obtain, and maintain by any means, in and affecting interstate commerce, a person,  
namely, MT, and did benefit, financially and by receiving anything of value, from  
participation in a venture which recruited, enticed, harbored, transported, provided,  
obtained, and maintained by any means MT, knowing, and in reckless disregard of the  
fact, and having had a reasonable opportunity to observe MT, that MT had not attained the  
age of 18 years, and would be caused to engage in a commercial sex act, as defined in  
Title 18, United States Code, Section 1591(e)(3), all in violation of Title 18, United States  
Code, Sections 1591(a), 1591(b)(2), and 1591(c);

In violation of Title 18, United States Code, Section 1594(c).

COUNT FOUR

**Transportation of a Minor**

The Grand Jury Further Charges:

From on or about January 31, 2015, and continuing until on or about February 7, 2015, in the District of North Dakota, and elsewhere,

TYRICE EXCELL AKINS  
and  
KURTIS WILLIAM JOHNSON,

individually, and by aiding and abetting, did knowingly transport an individual who had not attained the age of 18 years, namely, MT, in interstate commerce, with the intent that MT engage in prostitution;

In violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT FIVE

**Transportation of a Minor**

The Grand Jury Further Charges:

From on or about March 4, 2015, and continuing until on or about March 7, 2015,  
in the District of North Dakota, and elsewhere,

TYRICE EXCELL AKINS,  
KURTIS WILLIAM JOHNSON, and  
TARA MALINDA RIDLEY,

individually, and by aiding and abetting, did knowingly transport an individual who had  
not attained the age of 18 years, namely, MT, in interstate commerce, with the intent that  
MT engage in prostitution;

In violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT SIX

**Transportation to Engage in Prostitution**

The Grand Jury Further Charges:

From or about December 19, 2014, and continuing until on or about December 20, 2014, in the District of North Dakota, and elsewhere,

TYRICE EXCELL AKINS  
and  
KURTIS WILLIAM JOHNSON,

individually, and by aiding and abetting, did knowingly transport any individual, namely, CT and CW, in interstate commerce, with the intent that such individuals engage in prostitution;

In violation of Title 18, United States Code, Sections 2421 and 2.

COUNT SEVEN

**Transportation to Engage in Prostitution**

The Grand Jury Further Charges:

From on or about January 17, 2015, and continuing until on or about January 26, 2015, in the District of North Dakota, and elsewhere,

TYRICE EXCELL AKINS  
and  
KURTIS WILLIAM JOHNSON,

individually, and by aiding and abetting, did knowingly transport any individual, namely, CT, in interstate commerce, with the intent that such individuals engage in prostitution;

In violation of Title 18, United States Code, Sections 2421 and 2.

COUNT EIGHT

**Transportation to Engage in Prostitution**

The Grand Jury Further Charges:

From on or about January 31, 2015, and continuing until on or about February 7, 2015, in the District of North Dakota, and elsewhere,

TYRICE EXCELL AKINS  
and  
KURTIS WILLIAM JOHNSON,

individually, and by aiding and abetting, did knowingly transport any individual, namely, CT, in interstate commerce, with the intent that such individuals engage in prostitution;

In violation of Title 18, United States Code, Sections 2421 and 2.



COUNT NINE

**Transportation to Engage in Prostitution**

The Grand Jury Further Charges:

From on or about March 4, 2015, and continuing until on or about March 7, 2015,  
in the District of North Dakota, and elsewhere,

TYRICE EXCELL AKINS  
and  
KURTIS WILLIAM JOHNSON,

individually, and by aiding and abetting, did knowingly transport any individual, namely,  
CT, in interstate commerce, with the intent that such individuals engage in prostitution;

In violation of Title 18, United States Code, Sections 2421 and 2.

COUNT TEN

**Conspiracy**

The Grand Jury Further Charges:

From in or about December 2014 and continuing until on or about March 7, 2015,  
in the District of North Dakota, Florida, Louisiana, and elsewhere,

TYRICE EXCELL AKINS,  
KURTIS WILLIAM JOHNSON,  
TARA MALINDA RIDLEY, and  
MICHELLE ANN LATTER

knowingly and willfully combined, conspired, confederated, and agreed with each other  
and others, both known and unknown to the grand jury, to commit offenses against the  
United States, including:

- a) Knowingly transporting any individual, namely, CT and CW, in interstate  
commerce, with the intent that such individual engage in prostitution, in  
violation of Title 18, United States Code, Sections 2421 and 2; and
- b) Knowingly transporting an individual who had not attained the age of 18  
years to travel, namely, MT, in interstate commerce, to engage in  
prostitution, in violation of Title 18, United States Code, Sections 2423(a)  
and 2.

Overt Acts

In furtherance of the conspiracy and to affect its objects, the following overt acts,  
among others, were committed in the District of North Dakota, and elsewhere, in violation  
of Title 18, United States Code, Section 371:

- a) On or about the dates shown below, TYRICE EXCELL AKINS and KURTIS WILLIAM JOHNSON, individually, and by aiding and abetting, transported and arranged for the transportation of the individuals shown below from Wisconsin to North Dakota, Florida, and Louisiana, with the intent that said individuals engage in prostitution;

<b>Dates</b>	<b>Individual Transported</b>	<b>Destination</b>
December 13-17, 2014	CT	Florida
December 13-17, 2014	CW	Florida
December 19-20, 2014	CT	North Dakota
December 19-20, 2014	CW	North Dakota
January 17 - 26, 2015	CT	North Dakota
January 31, 2015, - February 5, 2015	CT	North Dakota
January 31, 2015, - February 5, 2015	MT	North Dakota
February 16-19, 2015	CT	Louisiana
March 4 - 7, 2015	CT	North Dakota
March 4 - 7, 2015	MT	North Dakota

- b) TYRICE EXCELL AKINS instructed the individuals on pricing for different sexual activities and provided the individuals with cell phones;
- c) TYRICE EXCELL AKINS and KURTIS WILLIAM JOHNSON, individually and by aiding and abetting, took photographs of MT, CT, and CW in sexually explicit poses for the purpose of posting the photographs to the escort section of backpage.com, an online advertising website;
- d) TYRICE EXCELL AKINS and others, both known and unknown to the grand jury, rented hotel rooms for MT, CT, and CW to use to engage in prostitution;

- e) TYRICE EXCELL AKINS, KURTIS WILLIAM JOHNSON, TARA MALINDA RIDLEY, and MICHELLE ANN LATTEr, individually, and by aiding and abetting, rented and drove vehicles for the purpose of transporting MT, CT, and CW to various locations to engage in prostitution; and
- f) TYRICE EXCELL AKINS instructed MT, CT, and CW to provide a portion of the proceeds from their prostitution activities to AKINS.

In violation of Title 18, United States Code, Section 371.

A TRUE BILL:

/s/ Foreperson  
Foreperson

/s/ Christopher C. Myers  
CHRISTOPHER C. MYERS  
Acting United States Attorney

JKP:lal:tla